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Attorney for ROBERT McCOMMAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,	) No. 2:21-cr-110 JAM
Plaintiff,	)
	) STIPULATION AND [PROPOSED] ORDER TO
v.	) CONTINUE STATUS CONFERENCE
	)
JUAN ZAMORA-TORRES,	) Requested date: 12-14-2021
JULIO MENDOZA-MADRIGAL,	) Time: 9:30 a.m.
DORIAN WILLES,	) Judge: Hon. John A. Mendez
ROBERT McCOMMAS and	)
HEATHER ROMOSER,	)
Defendants.	)

It is hereby stipulated between the parties, Aaron Pennekamp, Assistant United States Attorney, Noa Oren, Assistant Federal Defender, attorney for defendant JUAN ZAMORA-TORRES, Preciliano Martinez, attorney for defendant JULIO MENDOZA-MADRIGAL, Chris Cosca, attorney for defendant DORIAN WILLES, Michael D. Long, attorney for defendant ROBERT McCOMMAS, and Toni White, attorney for defendant HEATHER ROMOSER, that the status conference set for September 21, 2021, at 9:30 a.m. should be continued and re-set for December 14, 2021, at 9:30 a.m.

The parties further agree that this court should make a finding of good cause for the requested extension and that in fact good cause is hereby shown. The government has provided over 40,000 pages of discovery. All attorneys continue to read and view the discovery, investigate the case and meet with their respective clients. Counsel for defendants believe that failure to grant the above-

1 requested continuance would deny counsel the reasonable time necessary for effective preparation,  
2 taking into account the exercise of due diligence.

3 All parties are available to appear in this case on December 14, 2021.

4 Each party further stipulates that the ends of justice served by granting such continuance  
5 outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already  
6 been excluded through September 21, 2021.

7 All parties request the date of December 14, 2021, for the status hearing. The request for  
8 extending the date for the status conference is at the specific request of each of the defendants and  
9 with the knowing, intelligent and voluntary waiver of each defendant's speedy trial rights under the  
10 law. The government agrees that a continuance is necessary. Good cause is hereby shown.

11 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,  
12 within which trial must commence, the time period from today's date to December 14, 2021,  
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
14 because it results from a continuance granted by the Court at defendants' request on the basis of  
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
16 of the public and the defendant in a speedy trial.

17 Dated: September 7, 2021

18 Respectfully submitted,

19 /s/ Michael D. Long  
20 MICHAEL D. LONG  
21 Attorney for Robert McCommas

22 /s/ Noa Oren  
23 A.F.D. NOA OREN  
24 Attorney for Juan Zamora Torres

25 /s/ Preciliano Martinez  
26 PRECILIANO MARTINEZ  
27 Attorney for Julio Mendoza Madrigal  
28

/s/ Chris Cosca

CHRIS COSCA  
Attorney for Dorian Willes

/s/ Toni White

TONI WHITE  
Attorney for Heather Romoser

Dated: September 7, 2021

PHILLIP TALBERT  
Acting United States Attorney

/s/ Aaron Pennekamp

AARON PENNEKAMP  
Assistant U.S. Attorney

ORDER

**GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.**

The date for the status hearing in this matter is hereby re-set for December 14, 2021, at 9:30 a.m., before District Court Judge John A. Mendez.

Time is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Time is excluded through the new hearing date of December 14, 2021.

Dated: 9/8/2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE